

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT**

IN RE:

CHARLES R. VANOVER,
LISA A. VANOVER,

Case No. 06-56983-SWR
Honorable STEVEN W. RHODES
Chapter 13

Debtors.

_____ /

**WAYNE COUNTY TREASURER'S OBJECTIONS TO CONFIRMATION
OF PROPOSED CHAPTER 13 PLAN**

NOW COMES Creditor, Wayne County Treasurer, by and through its attorneys, KILPATRICK & ASSOCIATES, P.C., and hereby objects to the proposed Chapter 13 Plan, and states as follows:

1. That Creditor, Wayne County Treasurer's Office, is the tax collecting governmental unit for Wayne County. As such, it is the Treasurer's duty to collect property taxes for the county and various cities within the county, which accrue on both real and personal property.

2. The Debtors are indebted to the Wayne County Treasurer in the amount of Two Thousand Seven Hundred Eighty Eight and 50/100 Dollars (\$2,788.50) as a result of the Debtors' failure to pay real estate property taxes for the year of 2005 on the premises located at 43260 Judd Road, Belleville, Michigan, which is the Debtors' principal residence.

3. The proposed Plan understates the amount of indebtedness owed to the Wayne County Treasurer, and therefore, does not grant this holder of a fully secured claim the treatment required under 11 U.S.C. §506(b), 11 U.S.C. §1322 and 11 U.S.C. §1325.

4. To render the Plan confirmable, the Debtors are required to provide for full repayment of the Treasurer's secured claims with statutory interest and retention of the Treasurer's lien pursuant to 11 U.S.C. §506(b), 11 U.S.C. § 1322, 11 U.S.C. § 1325, 11 U.S.C. § 511 and M.C.L. 211.59.

5. The inclusion of the correct treatment for the secured claims held by the Treasurer may impact feasibility. Feasibility is required under 11 U.S.C. §1325(a)(6).

WHEREFORE, Creditor prays this Honorable Court deny confirmation of the proposed Chapter 13 Plan, and alternatively, dismiss this matter or convert this matter to a Chapter 7 proceeding.

Respectfully submitted,

KILPATRICK & ASSOCIATES, P.C.
Attorneys for the Wayne County Treasurer

By: /s/ Richardo I. Kilpatrick
RICHARDO I. KILPATRICK (P35275)
615 Griswold, Suite 1004
Detroit, MI 48226
(313) 963-2581

Dated: December 18, 2006